JUL 29 2016

## IN THE UNITED STATES DISTRICT COURT

## FOR THE WESTERN DISTRICT OF VIRGINIA

## Charlottesville Division

UNITED STATES OF AMERICA	) CRIMINAL NO. 3:16-cr-00014
V.	) ) UNDER SEAL
AARON MARKEITH GERALD	) ) 18 U.S.C. § 1962(d)
a/k/a "Cash",	) Racketeering Conspiracy
a/k/a "Maserati Fox",	)
a/k/a "Mr. Cash,"	)
a/k/a "Cash Diamonds",	)
a/k/a "Big Youngin"	)

## MOTION TO SEAL

The United States of America, by and through JOHN P. FISHWICK, JR., United States Attorney for the Western District of Virginia, Grayson A. Hoffman, Assistant United States Attorney, and Trial Attorney Marianne Shelvey, moves the Court pursuant to Local Rule 9(b)(7) for an Order extending the present sealing order for an additional period of ninety days or until otherwise ordered by this Court. In support of this motion, the government states that the investigation of this matter is ongoing and sensitive. The defendant is a former member of a gang called the Mad Stone Bloods (MSB), which is a Bloods gang with rules that mandate significant violence upon those who cooperate with law enforcement. Accordingly, the government requests that the Court seal this entire case for safety reasons, as well.

<sup>1</sup> By this motion, the government does not seek to seal the courtroom during any proceedings.

Wherefore, the United States requests that the Court seal this entire case for an additional period of ninety days or until otherwise ordered by the Court.

Respectfully submitted,

JOHN P. FISHWICK, JR. United States Attorney

Date: July 29, 2016

s/ Grayson A. Hoffman
Grayson A. Hoffman
Assistant United States Attorney
Virginia State Bar No. 73726

/s Marianne Shelvey
Trial Attorney,
United States Department of Justice
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